MDL Privilege Number	Production Beg Bates	Production End Bates	Date	Custodian	Author	Recipient	сс	Description	Privilege Claim	PEC Challenges
ABDCMDL_ PRIV_00069			1/20/2015	Cherveny, E	Cherveny, E.	May, D.; Hazewski, E.		Email with attachments among client employees discussing legal advice (Campbell, E./Esq.) regarding updates to diversion control forms.	Attorney- Client Privilege	Diversion control is a regulatory and/or business matter, and not a legal one. Attorney does not appear in the metadata and/or attorney involvement is indirect. Only attorney identified is in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_ PRIV_00094			2/18/2015	Cherveny, E	May, D.	Campbell, E./Esq.; Cherveny, E.		Email with attachment from client to in- house counsel seeking legal advice regarding diversion control training.	Attorney- Client Privilege	not a legal one. Only attorney participating in the communication is in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_00310			8/3/2015	Cherveny, E	Caroline, D./Esq.	Hartman, S.; May, D.; Engler, T.	Cherveny, E.	Email from in-house counsel to client providing legal advice regarding draft presentation slides on diversion control process.	Attorney- Client Privilege	Presentation distribution/audience is not provided and/or unproven. Subject involves a regulatory and/or business matter, and not a legal one. Only attorney participating in the communication is in-house counsel, and egal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_00324			8/6/2015	Cherveny, E	May, D.	Cherveny, E.		Email with attachment among client employees discussing legal advice from the ABC Legal Department regarding draft diversion control policy.	Attorney- Client Privilege	Specific attorney is not identified. Attorney does not appear in the metadata. No attorney involvement is proven. Diversion control is a regulatory and/or business matter, and not a legal one. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL PRIV 00577			4/25/2014	May D	May, D.	Hartman, S.; Hazewski, E.; Garcia, E.; Guerreiro, M.; Martin, E.; Kreutzer, K.; St. John, K.		Email with attachment among client employees discussing information prepared at the direction of the ABC Legal Department regarding weekly CSRA summary.	Attorney- Client Privilege	attorney goes not appear in the metagata. Specific attorney not identified and/or attorney involvement is indirect. Distribution of weekly report is not proven to be limited. Subject involves a regulatory and/or business matter, and not a legal one. Privilege claim is inconsistent with prior discovery rulings.
ABDCMDL_PRIV_00874			3/24/2015		Byrne, T.	Caroline, D./Esq.	May, D.	Email from client to in-house counsel seeking legal advice regarding Thoughtspot.	Attorney- Client	Subject involves a regulatory and/or business matter, and not a legal one. Only attorney participating in the communication is in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_02654			8/9/2013	Hazewski, E.	Hazewski, E.	Garcia, E.; Tomkiewicz, J.		Email with attachment among client employees discussing report prepared by consultant at the direction of in-house counsel (Campbell, E./Esq.) regarding review of the OMP.	Attorney- Client Privilege	Third party involvement destroys privilege. Subject involves a regulatory and/or business matter, and not a legal one. Attorney does not appear to be involved in communication and/or does not appear in the metadata. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_ PRIV_02660			9/9/2013	Hazewski, E.	Tomkiewicz, J.	Hazewski, E.		Email with attachment among client employees discussing report prepared by consultant at the direction of in-house counsel (Campbell, E./Esq.) regarding review of the OMP.	Attorney- Client Privilege	Third party involvement destroys privilege. Subject involves a regulatory and/or business matter, and not a legal one. Attorney does not appear to be involved in communication and/or does not appear in the metadata. Privilege claim is inconsistent with prior Discovery Rulings
ABDCMDL_PRIV_02666			10/3/2013	Hazewski, E.	Hazewski, E.	St. John, K.		Email attaching memorandum from client to in-house counsel (Fox, M./Esq.; Campbell. E. /Esq.) containing report from consultant prepared at the direction of counsel regarding review of OMP.	Attorney- Client Privilege	Third party involvement destroys privilege. Subject involves a regulatory and/or business matter, and not a legal one. Attorney does not appear to be involved in communication and/or does not appear in the metadata. Privilege claim is inconsistent with prior Discovery Rulings.

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					Email with attachment from consultant to		Third party involvement destroys privilege. Subject involves
					client employee discussing attached		a regulatory and/or business matter, and not a legal one.
					privileged memorandum sent to in-house	Attorney-	Attorney does not appear to be involved in communication
					counsel (Campbell, E./Esq.) regarding ABC	Client	and/or does not appear in the metadata. Privilege claim is
ABDCMDL PRIV 02719	8/15/2014 Hazewski, E.	Mapes, M.	Hazewski, E.		OMP review.	Privilege	inconsistent with prior Discovery Rulings.
//BBCN/BE_11(1V_02/13	0/15/2014 Huzewski, E.	Widpes, IVI.	Tidzewski, E.			TTTTTEE	· · · ·
					Email with attachment from consultant to		Third party involvement destroys privilege. Subject involve
					client employee discussing attached		a regulatory and/or business matter, and not a legal one.
					privileged memorandum sent to in-house	Attorney-	Attorney does not appear to be involved in communication
					counsel (Campbell, E./Esq.) regarding ABC	Client	and/or does not appear in the metadata. Privilege claim is
ABDCMDL_ PRIV_02720	8/21/2014 Hazewski, E.	Mapes, M.	Hazewski, E.		OMP review.	Privilege	inconsistent with prior Discovery Rulings. Attorney does not appear in the metadata. Specific
							attorney does not appear in the metadata. Specific attorney not identified and/or attorney involvement is
							indirect. Distribution of weekly report is not proven to be
					Email attaching ABC Lagal/CCDA hi waaldh	Attornov	
					Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
ADDCAADL DDIV 02002	0/2/2007 Curadu B	Country D	Maria 6		report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL_PRIV_02883	8/3/2007 Gundy, B.	Gundy, B.	Mays, S.		client employees.	Privilege	w/ prior Discovery Rulings. Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
							indirect. Distribution of weekly report is not proven to be
					Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
					report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL PRIV 02884	8/6/2007 Gundy, B.	Gundy, B.	Zimmerman, C.		client employees.	Privilege	w/ prior Discovery Rulings.
							Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
							indirect. Distribution of weekly report is not proven to be
					Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
					report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL_ PRIV_02885	8/17/2007 Gundy, B.	Gundy, B.	Kenny, C.		client employees.	Privilege	w/ prior Discovery Rulings. Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
							indirect. Distribution of weekly report is not proven to be
					Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
					report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL PRIV 02886	8/31/2007 Gundy, B.	Gundy, B.	Hazewski, E.		client employees.	Privilege	w/ prior Discovery Rulings.
ABDCIVIDE_TRIV_02000	6/31/2007 Gundy, B.	Gullay, D.	Hazewski, E.		cheft employees.	TTIVILEGE	Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
							indirect. Distribution of weekly report is not proven to be
					Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
					report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL_ PRIV_02887	8/31/2007 Gundy, B.	Gundy, B.	Kenny, C.		client employees.	Privilege	w/ prior Discovery Rulings. Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
					Empil attaching ABC Lass I/CCDA hi	Attour	indirect. Distribution of weekly report is not proven to be
			Mayo C. Bass B. Cundy B. Com		Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
ARDOMDI BRIV 03000	0/7/2027	7imama a : C	Mays, S.; Ross, P.; Gundy, B.; Crow,	Kanny C	report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL_PRIV_02888	9/7/2007 Gundy, B.	Zimmerman, C.	κ.	Kenny, C.	client employees.	Privilege	w/ prior Discovery Rulings. Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
							indirect. Distribution of weekly report is not proven to be
					Email attaching ABC Legal/CSRA bi-weekly	Attorney-	limited. Subject involves a regulatory and/or business
					report with discussion of report among	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL PRIV 02889	9/14/2007 Gundy, B.	Gundy, B.	Kenny, C.		client employees.	Privilege	w/ prior Discovery Rulings.
		,,			Email with attachment among client		Subject involves a regulatory and/or business matter, and
					employees discussing OMP audit report	Attorney-	not a legal one. No attorney appears to be involved in the
			Tomkiewicz, J.; Kreutzer, K.;		prepared at the direction of counsel	Client	communication. Privilege claim is inconsistent with prior
ABDCMDL_ PRIV_02917	11/9/2010 Tomkiewicz, J.	Hazewski, E.	Breitmayer, D.		(Swartz, D./Esq.).	Privilege	Discovery Rulings.

						1	Distribution of weekly summary does not appear to be
							limited and/or limited distribution is not proven. Subject
			Chou, J./Esq.; Fox, M./Esq.;		Email with attachment from client to in-	Attorney-	involves a regulatory and/or business matter, and not a
			Greenhall, R./Esq.; Gaddes, K.;	Guttman, T.; Crow, R.; Gundy, B.;	house counsel seeking legal advice	Client	legal one. Privilege claim is inconsistent with prior
ABDCMDL_ PRIV_3650	7/25/2014 M	Nays, S. Zimmern	ian, C. Stone, R./Esq.; Bausinger, V.	May, D.; Mays, S.; Ross, P.	regarding CSRA weekly summary.	Privilege	Discovery Rulings.
							Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
					Email with attachments among client		indirect. Distribution of weekly report is not proven to be
					employees discussing legal advice from in-	Attorney-	limited. Subject involves a regulatory and/or business
			Crow, R.; Gundy, B.; May, D.; Ma	ys,	house counsel (Chou,J/Esq.) regarding	Client	matter, and not a legal one. Privilege claim is inconsistent
ABDCMDL_ PRIV_3654	8/18/2014 M	Mays, S. Zimmern	ian, C. S.; Ross, P.		CSRA weekly reports.	Privilege	with prior discovery rulings.
							Distribution of weekly report is not proven to be limited.
							Subject involves a regulatory and/or business matter, and
							not a legal one. Attorney does not appear in the metadata.
							Specific attorney not identified and/or attorney
							involvement is indirect. Any attorney involvement, if
					Email among client employees prepared at	Attorney-	proven, would appear to be limited to in-house counsel,
					the direction of in-house counsel (Chou,	Client	and legal advice is not presumed and/or not proven.
ABDCMDL PRIV 3680	10/30/2014 M	Mays, S. Madsen,	G. Mays, S.		J./Esq.) regarding CSRA weekly update.	Privilege	Privilege claim is inconsistent with prior discovery rulings.
ABDCIVIDE_PRIV_3080	10/30/2014 10	viays, 3.	G. Iviays, 5.		J./ESq./ regarding CSKA weekly update.	riiviiege	
							Large distribution indicates lack of privilege. Privilege
							description is overly vague and/or overbroad to the extent
							that burden of proving privilege has not been met. To the
							extent a subject has been provided, it appears to involve a
					Email among client employees discussing		business matter, and not a legal one. Attorney involvement
					information prepared at the direction of	Attorney-	appears limited to in-house counsel, and legal advice is not
			Zimmerman, C.; Eddy, J./Esq.;	Mays. S.: May. D.: Ross. P.: Hartman	, the ABC Legal Department regarding	Client	presumed and/or not proven. Privilege claim is inconsistent
ABDCMDL PRIV 3907	7/12/2016 M	Aavs. S. Hartman		S.	Thoughtspot.	Privilege	with prior Discovery Rulings.
	, , , , , ,	1,1,1	, , , , , , , , , , , , , , , , , , , ,			-0-	Attorney does not appear in the metadata. Specific
							attorney not identified and/or attorney involvement is
							indirect. Any attorney involvement, if proven, would appear
							to be limited to in-house counsel, and legal advice is not
					5 7 71 71 15 16 17 17 11		presumed and/or not proven. Distribution of weekly report
					Email with attachment from client to the	Attorney-	is not proven to be limited. Subject involves a regulatory
	. / /				ABC Legal Department seeking legal advice	Client	and/or business matter, and not a legal one. Privilege claim
ABDCMDL_ PRIV_4569	4/24/2014 Zi	immerman, C. Mays, S.	Glover, S./Legal Department	Zimmerman, C.	regarding CSRA weekly summary.	Privilege	is inconsistent with prior discovery rulings. Diversion control is a regulatory and/or business matter,
							and not a legal one. Attorney does not appear in the
					Draft presentation prepared by the ABC	Attorney-	metadata and/or no specific attorney is identified as
		ABC Lega			,	,	, ,
ABDCMDL PRIV 4570	4/24/2014 Zi				Legal Department regarding diversion control program overview.	Client Privilege	required. Privilege claim is inconsistent w/ prior Discovery Rulings.
ADDCIVIDL_PRIV_4570	4/24/2014 21	ininierman, c. Departm	ent Zimmerman, C.		control program overview.	rrivilege	nulligs.
							Drug diversion is a regulatory and/or business matter, and
							not a legal one. Attorney does not appear in the metadata.
					Email among client employees discussing		To the extent attorney involvement is identified, it appears
					legal advice from in-house counsel	Attorney-	limited to in-house counsel, and legal advice is not
					(Greenhall, R./Esq.) regarding speaker on	Client	presumed and/or not proven. Privilege claim is inconsistent
ABDCMDL PRIV 4576	4/30/2014 Zi	immerman, C. Zimmern	ian, C. Ross, P.		drug diversion at ThoughtSpot.	Privilege	with prior Discovery Rulings.
7.55 S.VIDE_11114_4575	4/30/2014 21	ciman, c. Zimiliem	1000,11	<u> </u>	a. ag aiversion at moughtopot.	viicgc	, ,
							Drug diversion is a regulatory and/or business matter, and
							not a legal one. Attorney does not appear in the metadata.
					Email among client employees discussing		To the extent attorney involvement is identified, it appears
					legal advice from in-house counsel	Attorney-	limited to in-house counsel, and legal advice is not
					S .	Client	presumed and/or not proven. Privilege claim is inconsistent
ABDCMDL PRIV 4577	4/30/2014 7i	immerman. C. Zimmern	ian. C. Crow. R.				
ARDOMDI PRIV 4577	4/30/2014 Zi	immerman, C. Zimmern	ian, C. Crow, R.		(Greenhall, R./Esq.) regarding speaker on drug diversion at ThoughtSpot.	Client Privilege	presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.

In re National Prescription Opidate Litigation MDL No. 2804

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	AmerisourceBergen Drug	g Corporation Privilege Log (v001)	

ABDCMDL_ PRIV_4578	4/30/2014	Zimmerman, C.	Zimmerman, C.	Chou, J./Esq.; Nachman, M./Esq.	Greenhall, R./Esq.; Gundy, B.	Email from client to in-house counsel seeking legal advice regarding speaker on drug diversion at ThoughtSpot.	Attorney- Client Privilege	Drug diversion is a regulatory and/or business matter, and not a legal one. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_ PRIV_4579	4/30/2014	Zimmerman, C.	Zimmerman, C.	Gundy, B.		Email among client employees discussing legal advice from in-house counsel (Chou, J./Esq.) regarding speaker on drug diversion at ThoughtSpot.	Attorney- Client Privilege	Drug diversion is a regulatory and/or business matter, and not a legal one. Attorney does not appear in the metadata. To the extent attorney involvement is identified, it appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_4580	4/30/2014	Zimmerman, C.	Zimmerman, C.	Gundy, B.; Crow, R.		Email among client employees discussing legal advice from in-house counsel (Chou, J./Esq.) regarding speaker on drug diversion at ThoughtSpot.	Attorney- Client Privilege	Drug diversion is a regulatory and/or business matter, and not a legal one. Attorney does not appear in the metadata. To the extent attorney involvement is identified, it appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL PRIV 4581	4/30/2014	. Zimmerman, C.	Zimmerman, C.	Crow, R.		Email among client employees discussing need for legal advice from in-house counse (Greenhall, R./Esq.) regarding diversion control training program.	l Attorney- Client Privilege	Drug diversion is a regulatory and/or business matter, and not a legal one. Attorney does not appear in the metadata. To the extent attorney involvement is identified, it appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings. Attorney is not included in the metadata. Attorney
ABDCMDL_PRIV_4582		Zimmerman, C.	Zimmerman, C.	Gundy, B.; Crow, R.		Email among client employees discussing legal advice from in-house counsel (Chou, J./Esq.) regarding diversion control training program.	Attorney-	Attorney is not included in the metadata. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Training for diversion control is a regulatory and/or business matter, and not a legal one. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_4583	4/30/2014	Zimmerman, C.	Robinson, S.	Chou, J./Esq.; Zimmerman, C.	Caffentzis, A.	Email from client to in-house counsel seeking legal advice regarding drug diversion presentation.	Attorney- Client Privilege	Drug diversion is a regulatory and/or business matter, and not a legal one. Attorney involvement appears limited to inhouse counsel, and legal advice is not presumed and/or not proven. Distribution appears to be larger than indicated and/or limited distribution is not proven. Privilege claim is inconsistent w/ prior Discovery Rulings.
ABDCMDL_PRIV_4584	4/30/2014	Zimmerman, C.	Chou, J./Esq.	Zimmerman, C.		Email from in-house counsel to client providing legal advice regarding drug diversion presentation.	Attorney- Client Privilege	Drug diversion is a regulatory and/or business matter, and not a legal one. Attorney involvement appears limited to inhouse counsel, and legal advice is not presumed and/or not proven. Distribution appears to be larger than indicated and/or limited distribution is not proven. Privilege claim is inconsistent with prior Discovery Rulings.
						Email with attachment among client employees discussing information prepared		Attorney does not appear in the metadata. Specific attorney not identified and/or attorney involvement is indirect. Any attorney involvement, if proven, would appear to be limited to in-house counsel, and legal advice is not presumed and/or not proven. Distribution of weekly report is not proven to be limited. Subject involves a regulatory
ABDCMDL_ PRIV_4585	5/2/2014	Zimmerman, C.	Zimmerman, C.	Gundy, B.		at direction of in-house counsel (Chou, J./Esq.) regarding CSRA weekly update.	Client Privilege	and/or business matter, and not a legal one. Privilege claim is inconsistent with prior discovery rulings.

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						Email with attachment among client		Attorney does not appear in the metadata. Specific attorney not identified and/or attorney involvement is indirect. Any attorney involvement, if proven, would appear to be limited to in-house counsel, and legal advice is not presumed and/or not proven. Distribution of weekly report
						employees discussing information prepared		is not proven to be limited. Subject involves a regulatory
ADDCAADL DDIV ACGO	E /10 /2014	?: C	7:	Anakan D		at direction of in-house counsel (Chou,	Client	and/or business matter, and not a legal one. Privilege claim
ABDCMDL_ PRIV_4603	5/19/2014 2	Zimmerman, C.	Zimmerman, C.	Archer, P.		J./Esq.) regarding CSRA weekly update.	Privilege	is inconsistent with prior discovery rulings.
ABDCMDL PRIV 4644	7/11/2014 2	Zimmerman, C.	Norton, R.	Freitas, K.	Zimmerman, C.; Oswalt, A.	Email from client to consultant discussing legal advice from the ABC Legal Department regarding draft response.	Attorney- Client Privilege	Privilege description is vague and overbroad such that burden of proving privilege has not been met. No attorney is identified in the metadata and no specific attorney is identified as being involved in communication. Third party involvement destroys privilege. Privilege claim is inconsistent with prior Discovery Rulings.
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ABDCMDL PRIV 4645	7/11/2014	Zimmerman, C.	May, D.	Zimmerman, C.; Caroline, D./Esq.; Campbell, E./Esq.; Hartman, S.; Hazewski. E.		Email with attachment from client to in- house counsel seeking legal advice regarding Thought Spot diversion control training.	Attorney- Client Privilege	matter, and not a legal one. Distribution appears to be larger than indicated and/or limited distribution is not proven. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCNIDE_FRIV_4043	7/11/2014/2	illillierman, c.	Iviay, D.	iliazewski, L.		training.	Filvilege	Training for diversion control is a regulatory and/or business
				Zimmerman, C.; Caroline, D./Esq.; Hazewski, E.; Hartman, S.; St. John,		Email with attachment from client to in- house counsel seeking legal advice regarding Thought Spot diversion control	Attorney- Client	matter, and not a legal one. Distribution appears to be larger than indicated and/or limited distribution is not proven. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery
ABDCMDL_PRIV_4649	7/17/2014 2	Zimmerman, C.	May, D.	K.		training.	Privilege	Rulings.
ABDCMDL_PRIV_4650	7/17/2014 2	Zimmerman, C.	May, D.	Hazewski, E.; Hartman, S.; St. John, K.; Zimmerman, C.; Caroline, D./Esq.		Email with attachment from client to in- house counsel seeking legal advice regarding Thought Spot diversion control training.	Attorney- Client Privilege	matter, and not a legal one. Distribution appears to be larger than indicated and/or limited distribution is not proven. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL PRIV 4651	7/17/2014	Zimmerman, C.	May, D.	Byrne, T.; Kline, D.	Zimmerman, C.; Caroline, D./Esq.	Email with attachment from client to in- house counsel seeking legal advice regarding Thought Spot diversion control training.	Attorney- Client Privilege	Attorney is merely copied on the communication. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Training for diversion control is a regulatory and/or business matter, and not a legal one. Distribution appears to be larger than indicated and/or limited distribution is not proven.
ABDCMDL_PRIV_4051	//1//2014/2	Limmerman, C.	IVIAY, D.	Byrne, 1.; Kline, D.	Zimmerman, C.; Caroline, D./Esq.	training.	Privilege	Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_4653	7/20/2014 [2	Zimmerman, C.	Nachman, M./Esq.	May, D.; Caroline, D./Esq.	Zimmerman, C.	Email from in-house counsel to client providing legal advice regarding Thought Spot diversion control training.	Attorney- Client Privilege	matter, and not a legal one. Distribution appears to be larger than indicated and/or limited distribution is not proven. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.
ABDCMDL_PRIV_4654	7/21/2014 7	Zimmerman, C.	Zimmerman, C.	Hazewski, E.; May, D.; Caroline, D./Esq.	Mays, S.; Gundy, B.; Campbell, E./Esq.; Robinson, S.	Email from client to in-house counsel seeking legal advice regarding efficacy of state prescription databases.	Attorney- Client Privilege	Privilege description is vague and overbroad such that burden of proving privilege has not been met. To the extent a subject is provided, it appears to involve a business and/or regulatory matter, and not a legal one. Attorney involvement appears limited to in-house counsel, and legal advice is not presumed and/or not proven. Privilege claim is inconsistent with prior Discovery Rulings.

Zimmerman, C.

Chou, J./Esq.

7/15/2016 Zimmerman, C.

Privilege description is vague and overbroad such that burden of proving privilege has not been met. To the extent a subject is provided, it appears to involve a business matter, and not a legal one. Attorney involvement appears

limited to in-house counsel, and legal advice is not

with prior Discovery Rulings.

presumed and/or not proven. Privilege claim is inconsistent

Attorney-

Client

Privilege

Email with attachment from client to in-

house counsel seeking legal advice

regarding meeting agenda.

In re National Prescription Opidate Litigation MDL No. 2804

ABDCMDL_ PRIV_4936

WIDL NO. 2804							
							Training for diversion control is a regulatory and/or business
							matter, and not a legal one. Distribution appears to be
							larger than indicated and/or limited distribution is not
					Email with attachment from client to in-		proven. Attorney involvement appears limited to in-house
					house counsel seeking legal advice	Attorney-	counsel, and legal advice is not presumed and/or not
				Campbell, E./Esq.; Caroline, D./Esq.;	regarding Thought Spot diversion control	Client	proven. Privilege claim is inconsistent with prior Discovery
ABDCMDL_ PRIV_4665	7/28/202	4 Zimmerman, C.	May, D.	Zimmerman, C.	training.	Privilege	Rulings.
							OIVIP modification is a regulatory and/or business matter,
							and not a legal one. Attorney is not included in the
					Email among client employees discussing		metadata. Attorney involvement appears limited to in-
					legal advice provided by in-house counsel	Attorney-	house counsel, and legal advice is not presumed and/or not
					(Chou, J./Esq.) regarding OMP	Client	proven. Privilege claim is inconsistent w/ prior Discovery
ABDCMDL_ PRIV_4934	7/13/201	.6 Zimmerman, C.	Zimmerman, C.	Mays, S.	modifications.	Privilege	Rulings.
							CSRA information is a regulatory and/or business matter,
							and not a legal one. Distribution appears to be larger than
					Email with attachments from client to in-		indicated and/or limited distribution is not proven.
					house counsel seeking legal advice	Attorney-	Attorney involvement appears limited to in-house counsel,
				Hartman, S.; Zimmerman, C.;	regarding CSRA information for	Client	and legal advice is not presumed and/or not proven.
ABDCMDL_ PRIV_4935	7/14/203	.6 Zimmerman, C.	Eddy, J.	Casalenuovo, C./Esq.	ThoughtSpot.	Privilege	Privilege claim is inconsistent with prior Discovery Rulings.